

1 THE HONORABLE JAMES L. ROBART  
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UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

PROMEDEV, LLC dba RELIEF FACTOR  
Plaintiff,

v.

ROBY WILSON (individual) and  
MAXXIMEDIA ADVERTISING CO; and  
IMAGIPIX CORPORATION.

Defendants.

Case No. 2:22-CV-01063-JLR

**STIPULATED MOTION AND  
[PROPOSED] ORDER FOR  
EXTENSION OF TIME TO RESPOND  
TO MAXXIMEDIA'S AMENDED  
COUNTERCLAIMS**

**NOTING DATE: APRIL 3, 2023**

WHEREAS, on March 2, 2023, the Court granted in part Plaintiff Promedev, LLC's ("Promedev") motion to dismiss Defendants MaXXiMedia Advertising Co.'s First Amended Counterclaim and ordered that MaXXiMedia may file a second amended counterclaim, if any, no later than March 13, 2023. Dkt. #40.

WHEREAS, MaXXiMedia has elected not to file a second amended counterclaim.

AND WHEREAS, Promedev and Defendants Roby Wilson, MaXXiMedia Advertising Co., and Imagipix Corporation stipulate that, pursuant to Local Civil Rule 10(g) and Local Civil Rule 7(d)(1), Promedev's time to answer MaXXiMedia's First Amended Counterclaim shall be extended to Monday, April 17, 2023.

STIPULATED MOTION AND [PROPOSED] ORDER FOR  
EXTENSION OF TIME TO RESPOND TO  
MAXXIMEDIA'S AMENDED COUNTERCLAIMS - 1  
CASE NO. 2:22-CV-01063-JLR

1 Accordingly, all parties respectfully request that the Court enter an order extending the  
2 time for Promedev to answer MaXXiMedia's First Amended Counterclaim to Monday, April 17,  
3 2023.

4 IT IS SO STIPULATED.

5 Respectfully submitted this 4th day of April, 2023.

6 DLA PIPER LLP (US)

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Attorneys for Plaintiff  
Promedev LLC dba Relief Factor

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Attorneys for Defendants  
Roby Wilson, MaXXiMedia Advertising  
Co., and Imagipix Corporation

**[PROPOSED] ORDER**

The Court hereby grants the Parties' Stipulated Motion for Extension of Time to Respond to MaXXiMedia's Amended Counterclaims to April 17, 2023.

IT IS SO ORDERED on this 4th day of April, 2023.

  
The Honorable James L. Robart  
United States District Judge